

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

CAROLYN CLARK, *et al.*, on behalf of  
themselves and all others similarly situated,

Case No. 3:16-cv-00032 (MHL)

Plaintiffs,

v.

EXPERIAN INFORMATION SOLUTIONS,  
INC.,

Defendant.

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FRANCES D. BROWN, *et al.*, on behalf of  
themselves and all others similarly situated,

Case No. 3:16-cv-00670 (MHL)

Plaintiffs,

v.

EXPERIAN INFORMATION SOLUTIONS,  
INC.,

Defendant.

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**PLAINTIFFS' MOTION FOR FINAL APPROVAL OF FED. R. CIV. P. 23(b)(2) CLASS  
ACTION SETTLEMENT AGREEMENT AND FOR  
ATTORNEYS' FEES AND CLASS REPRESENTATIVE SERVICE AWARDS**

Plaintiffs, on behalf of themselves and all others similarly situated, by counsel, respectfully move for Final Approval of Class Action Settlement and for Attorneys' Fees and Class Representative Service Awards. Plaintiffs submit a brief in support with supporting declarations and a proposed order is attached as Exhibit 1.

Respectfully submitted,

**PLAINTIFFS,**

*individually and on behalf of all  
others similarly situated*

By: \_\_\_\_\_/s/\_\_\_\_\_

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#### **CERTIFICATE OF SERVICE**

I hereby certify that on January 5, 2019, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

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